

REDACTED – FOR PUBLIC INSPECTION

**VIA ECFS**

DATE, 2016

Ms. Marlene H. Dortch, Secretary  
 Federal Communications Commission  
 Office of the Secretary  
 445 12<sup>th</sup> Street, S.W.  
 Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**  
**WC Docket No. 14-58 - ETC Annual Reports and Certifications**

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Information – Subject to Protective Order Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, LaHarpe Telephone Company (the Company), Study Area Code 411791 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. *The version of the Company's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.*

The Company, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22,



2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that LaHarpe Telephone Company maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

**Five-Year Service Quality Improvement Plan Progress Report**

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, LaHarpe Telephone Company requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company maintains as confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Company's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Company's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a



map of the Company's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Company does not make publicly available.

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Company's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors valuable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.



- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Company's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

### **Financial Annual Report**

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). LaHarpe Telephone Company seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58.<sup>1</sup> The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

LaHarpe Telephone Company is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

<sup>1</sup> *Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, *Protective Order*, DA 16-296 (rel. Mar. 22, 2016).

**MOSS-ADAMS** LLP

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

In the filing submitted via ECFS, all pages containing confidential information bear the legend "REDACTED – FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric M. Votaw".

Eric Votaw, Senior Manager for  
Moss Adams LLP

EV/ch

Enclosures

cc: Harry Lee, Jr., President - LaHarpe Telephone Company

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED – FOR PUBLIC INSPECTION

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Harry Lee, Jr
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	harry.lee@laharpetel.com

Form Type	54.313 and 54.422
-----------	-------------------

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<110>	Has your company received its ETC certification from the FCC?	(yes / no )	<input checked="" type="radio"/>	<input type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no )	<input type="radio"/>	<input type="radio"/>

5 YEAR PLAN-Progress Report 411791KS112.doc, System map.pdf

Yes
Yes
Yes
Yes
Yes
Not Applicable

REDACTED – FOR PUBLIC INSPECTION

**(200) Service Outage Reporting (Voice)**  
**Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

<210> For the prior calendar year, were there any reportable voice service outages? No

[illegible]



<b>(300) Unfulfilled Service Request</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
		411791KS3010.pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

<b>(600) Functionality in Emergency Situations Data Collection Form</b>	<b>REDACTED – FOR PUBLIC INSPECTION</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	---	--

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	411791KS610.pdf

REDACTED – FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411791
-------	-----------------	--------

<015> Study Area Name LA HARPE TEL CO INC

<020>	Program Year	2017
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
-------	---	---------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030>      [harry.lee@laharpetel.com](mailto:harry.lee@laharpetel.com)

<701> Residential Local Service Charge Effective Date

1/1/2016

<702> Single State-wide Residential Local Service Charge

[illegible]

REDACTED – FOR PUBLIC INSPECTION

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

[illegible]

REDACTED – FOR PUBLIC INSPECTION

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com
<810>	Reporting Carrier	LaHarpe Telephone Company, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	LaHarpe Telephone Company, Inc.

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<900>	Does the filing entity offer tribal land services? (Y/N)	No
-------	--	----

--

--

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]



**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 411791KS1010.pdf

Name of Attached Document

<1020> Broadband comparability certification No

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

411791KS1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

“Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2000) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)






Name of Attached Document Listing  
Required Information

Name of Attached Document Listing  
Required Information

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing  
Required Information

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

(3005) Rate Of Return Carrier Additional Documentation  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	411791KS3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		<input type="checkbox"/>
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input checked="" type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input checked="" type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	411791KS3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

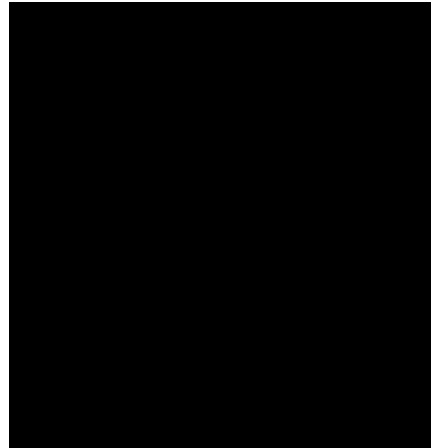
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



<b>(4005) Rural Broadband Experiment Additional Documentation</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
--	---

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
--	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
---	--	--

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
---	--	--



<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	411791
<015> Study Area Name	LA HARPE TEL CO INC
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035> Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: LA HARPE TEL CO INC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/28/2016
Printed name of Authorized Officer: Harry Lee Jr	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 6204962291 ext.	
Study Area Code of Reporting Carrier: 411791	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	411791
<015> Study Area Name	LA HARPE TEL CO INC
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035> Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

REDACTED – FOR PUBLIC INSPECTION

LINE 112 – Five Year Service Quality Improvement Progress Report

REDACTED FOR PUBLIC INSPECTION

Service Quality Standards & Consumer Protection Rules Compliance

To the best of my knowledge LaHarpe Telephone Company, Inc is in full compliance with all Service Quality Standards & Consumer Protection Compliance as provided for in the General Exchange Tariff for the LaHarpe Telephone Company, Inc. and approved by The State Corporation Commission of Kansas.

LaHarpe Telephone Company, Inc deployed fiber to the home in 2005 and we have had no quality of service issues since that time not related to acts of God, two fiber cuts, and issues with customer wiring and CPE.

We are compliant with billing standards, Customer Proprietary Network Information standards and Lifeline Service policy and procedures.

#### FUNCTIONALITY IN EMERGENCY SITUATIONS

LaHarpe Telephone Company, Inc. has a 25 KW natural gas fed generator equipped with automatic switching equipment to provide electrical power in the event of a commercial power failure. The office is equipped with back-up battery power and dual rectifiers' and inverters. The outside plant is entirely buried and consists of fiber buried a minimum of 36 inches deep and in orange poly duct to all hand holds. The customer drops are buried approximately 18 inches deep. We have 3 connections to the "outside" network and each use diverse routing and are buried and in poly duct at least 36 inches deep. Our switch is capable of completing 120 simultaneous calls and can be upgraded to allow as many as 570 simultaneous calls. . We have 2 e-911 trunks, 4 O + trunks, 1 operator verification trunk, 2 SS7 trunks with diversified routing, and 191 2 way voice traffic trunks.

REDACTED – FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	<a href="mailto:harry.lee@laharpetel.com">harry.lee@laharpetel.com</a>

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

REDACTED – FOR PUBLIC INSPECTION

**(710) Broadband Price Offerings**  
**Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com

[illegible]



REDACTED – FOR PUBLIC INSPECTION

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	411791
<015>	Study Area Name	LA HARPE TEL CO INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Harry Lee, Jr
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204962291 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	harry.lee@laharpetel.com
<810>	Reporting Carrier	LaHarpe Telephone Company, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	LaHarpe Telephone Company, Inc.

[illegible]

Response to Line 1010  
LaHarpe Telephone Company  
Study Area 411791

### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) LaHarpe Telephone Company ("LaHarpe") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2016. LaHarpe's current total local end-user rate<sup>1</sup> of \$18.15 (which includes a local fee of \$17.00 and surcharges) is not above the standard deviation as specified in the USF/ICC Transformation Order.<sup>2</sup>

---

<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

## TERMS AND CONDITIONS FOR LIFELINE CUSTOMERS

A copy of LaHarpe Telephone Company's Lifeline Service Program terms and conditions as filed and approved by the Kansas Corporation Commission is attached and is paragraph 2.12 of our General Exchange Tariff. We do not differentiate between Lifeline Service Customers and non-Lifeline Service Customers with respect to the toll service provider they may choose or the minutes of toll service they may use except as provided for in paragraph 2.12 E. Rules and Regulations.

THE STATE CORPORATION COMMISSION  
OF KANSAS

GENERAL EXCHANGE TARIFF  
Section 2  
6<sup>th</sup> Revised Sheet 2

(T) C. Program Eligibility Requirements

(T) 1. Lifeline will be provided for one (1) telephone line per household at the customer's principal place of residence where there is only one active local exchange access line to his/her residential premises or dwelling place.<sup>1</sup> A room or portion of a residence occupied exclusively by an individual not sharing equally as a member of the domestic establishment may be considered a separate dwelling unit (premises). Verification of this requirement will be through self-certification.

(T) 2. To be eligible for Lifeline assistance, a customer may qualify under either of the following criteria:

(T) a. The customer must show they are currently a recipient of benefits from one of the following public assistance programs:

- (T) (N)
1. Bureau of Indian Affairs General Assistance
  2. Food Distribution Program
  3. Food Distribution Program on Indian Reservations
  4. Free School Lunch Program
  5. General Assistance
  6. Low Income Energy Assistance Program (LIEAP)
  7. Medicaid
  8. Section 8 Federal Public Housing Program
  9. Supplemental Nutrition Assistance Program
  10. Supplemental Security Income (SSI)
  11. Temporary Assistance for Needy Families
  12. Tribally Administered Free School Lunch Program
  13. Tribally Administered Head Start (only those meeting its income qualifying standard)
  14. Tribally Administered Temporary Assistance for Needy Families

The customer must obtain and provide to the Company a copy of a valid identification card or the appropriate documents that are issued to them by the agency administering the program.

(D)

(D)

<sup>1</sup> A residential premises or dwelling place is that location where a customer resides, even if such residential premises or dwelling place is only a single room. Lifeline will not be provided if the customer has access to other local exchange telephone service within the residential premises or dwelling place, provided/owned by himself/herself or owned/provided by others. If, however, it can be determined by the Company that access to other existing local exchange telephone service owned/provided by others is virtually denied, or is inaccessible to the customer, then Lifeline service will be provided.

Issued: June 28, 2012

Effective: August 1, 2012

Harry J. Lee, Jr., President & General Manager  
LaHarpe Telephone Company  
109 W. 6<sup>th</sup> Street, PO Box 123  
LaHarpe, Kansas 66751

10-GIMT-658-GIT  
Accepted For Filing  
Kansas Corporation Commission  
July 3, 2012  
/S/ Patrice Petersen-Klein



THE STATE CORPORATION COMMISSION  
OF KANSAS

GENERAL EXCHANGE TARIFF  
Section.2  
2<sup>nd</sup> Revised Sheet 4

- (T) F. Credit and Collections
- (T) 1. If a Lifeline applicant is known to have a poor credit history, a deposit may be required.
- (T) 2. Once service has been established for a Lifeline customer, they will be subject to bill payment policies contained in this tariff applicable to all customers.
- (D)

2.2 Public Pay Telephone Service

2.21 Conditions

- A. A public telephone is an exchange station installed at the Company's option, equipped with a coin collecting device, at various locations within the exchange chosen or accepted by the Company as suitable and necessary for furnishing service to the general public. Location of all pay phones shall be at the sole discretion of the Company.
- B. Persons with whom arrangements are made by the Company for the installation of public telephones are considered as agents of the Company in serving the public.
- C. Public telephones are installed upon the agent signing established forms of application, without specific term, terminable by either an agent or the Company upon written notice.
- D. No listings in the directory or extension stations are allowed in connection with public telephone service.
- E. The Company may furnish public telephones without coin collecting equipment in selected locations for the purpose of satisfying demand for optional billing services on an originating basis only. In the normal mode, Coinless Public Telephone Service affords transients the option of selecting a preferred billing arrangement for outgoing messages: charging to a third number or to a Company credit card account, or placing calls collect. In certain locations, however, calls will be billed on a collect basis only.
- F. As in the case of Coin Public Telephones, the company is solely responsible for determining locations appropriate for installation of Coinless Public Telephones. The criteria for establishment of Coinless Service are potential usage and revenues, and public need and convenience.

2.22 Rates

A charge of \$0.25 applies for each local call originated through public pay station instruments. Standard long distance toll charges apply to all long distance calls. No charges are applied to connection with the Company's repair clerk, business office or any of its duly authorized officials.

Issued: June 28, 2012

Effective: August 1, 2012

Harry J. Lee, Jr., President & General Manager  
LaHarpe Telephone Company  
109 W. 6<sup>th</sup> Street, PO Box 123  
LaHarpe, Kansas 66751

10-GIMT-658-GIT  
Accepted For Filing  
Kansas Corporation Commission  
July 3, 2012  
/S/ Patrice Petersen-Klein

Response to Line3010  
LaHarpe Telephone Company  
Study Area 411791

#### Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) LaHarpe Telephone Company("LaHarpe") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 16-362, and that requests for such service are met within a reasonable amount of time. Details for how LaHarpe Telephone Company is meeting its obligations for meeting its goals and required obligations are specified within the FCC Form 481 annual filing.

REDACTED – FOR PUBLIC INSPECTION

LINE 3026– Audited Financial Statements

REDACTED FOR PUBLIC INSPECTION